

March 25, 2014

Michael Millman
P.O. Box 64637
2100 Sawtelle Boulevard, Suite 105
Los Angeles, CA 90064

Re: Your Request for Advice
Our File No. I-14-029

Dear Mr. Millman:

This letter responds to your request for advice regarding the campaign provisions of the Political Reform Act (the "Act").¹

After a review of your request, we are offering informal assistance as the facts presented are too vague to render formal advice.² Because your questions are general in nature and not limited to a specific governmental decision, we are treating your request as one for informal assistance.³

You ask several general questions regarding lobbyists potentially arranging or advising on political campaign contributions. Enclosed is the *Boatwright* Advice Letter, A-09-161 and the *Leonard* Advice Letter, I-93-170, which provide general guidance in this area. I have also enclosed a copy of the FPPC's Lobbying Disclosure Manual for your reference.

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

² While the Act requires the Commission to provide written advice to a person whose duties under the Act are in question (Section 83114(b); Regulation 18329(a)), the Commission may decline to provide advice if a response relates to past conduct or if the facts presented are insufficient or too vague to render specific informal assistance. (Regulation 18329(b)(8)(A) and (c)(4)(A) and (F)). In this instance, we have elected to provide general guidelines rather than declining your request for advice.

³ Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

We hope you find these materials helpful. Please contact us in the future should you have a request for advice regarding a specific governmental decision.

Sincerely,

Zackery P. Morazzini
General Counsel

By: Emelyn Rodriguez
Counsel, Legal Division

ER:jgl